

1 THE HONORABLE BENJAMIN H. SETTLE
2
3
4
5
6
7
8

9
10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT TACOMA

13
14
15
16
17 NORTHWEST SCHOOL OF SAFETY, a
18 Washington sole proprietorship, PUGET
19 SOUND SECURITY, INC., a Washington
20 corporation, PACIFIC NORTHWEST
21 ASSOCIATION OF INVESTIGATORS, INC.,
22 a Washington corporation, FIREARMS
ACADEMY OF SEATTLE, INC., a
Washington corporation, DARRYL LEE, XEE
DEL REAL, JOE WALDRON, GENE
HOFFMAN, ANDREW GOTTLIEB, ALAN
GOTTLIEB, GOTTLIEB FAMILY
REVOCABLE LIVING TRUST, a Washington
trust, and SECOND AMENDMENT
FOUNDATION, a non-profit organization,

23 Plaintiffs,

24 v.

25 BOB FERGUSON, Attorney General of
Washington (in his official capacity),
WASHINGTON ATTORNEY GENERAL'S
OFFICE, and JOHN R. BATISTE, Chief of the
Washington State Patrol (in his official
capacity), and DOES I-V,

Defendants.

Case No. 3:14-cv-06026 BHS

**DECLARATION OF STEVEN W. FOGG
IN SUPPORT OF PLAINTIFFS'
RESPONSE TO CHERYL STUMBO,
WASHINGTON ALLIANCE FOR GUN
RESPONSIBILITY, AND EVERYTOWN
FOR GUN SAFETY ACTION FUND FOR
I-594'S MOTION TO INTERVENE AS
DEFENDANTS**

DECLARATION OF STEVEN W. FOGG IN SUPPORT OF
PLAINTIFFS' RESPONSE TO MOTION TO INTERVENE - 1
Case No. 3:14-cv-06026 BHS

26 CORR CRONIN MICHELSON
BAUMGARDNER FOGG & MOORE LLP
1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900

1 Steven W. Fogg declares as follows:

2 1. I am an attorney at Corr Cronin Michelson Baumgardner Fogg & Moore LLP,
3 attorneys of record for Plaintiffs in the above-captioned matter. I am over eighteen years of age,
4 competent to testify and submit this declaration based upon personal knowledge in support of
5 Plaintiffs' Response to Cheryl Stumbo, Washington Alliance for Gun Responsibility, and
6 Everytown for Gun Safety Action Fund for I-594's Motion to Intervene as Defendants.

7 2. A true and correct copy of a mass email sent by the Washington Alliance for Gun
8 Responsibility on February 23, 2015 is attached as Exhibit A.

9 3. A true and correct copy of a mass email sent by the Washington Alliance for Gun
10 Responsibility on February 28, 2015 is attached as Exhibit B.

11 I declare under penalty of perjury under the laws of the state of Washington that the
12 foregoing is true and correct.

13 DATED this 9th day of March, 2015, at Seattle, Washington.

14
15 /s/ Steven W. Fogg
16 Steven W. Fogg, WSBA No. 23528
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

The undersigned certifies as follows:

1. I am employed at Corr Cronin Michelson Baumgardner Fogg & Moore LLP, attorneys for Plaintiffs herein.

2. On March 9, 2015, I filed the foregoing document through the Court's ECF service which will send notification of filing to the following parties indicated below:

Noah G. Purcell, WSBA No. 43492
Solicitor General
noahp@atg.wa.gov
R. July Simpson, WSBA No. 45869
Assistant Attorney General
RJulyS@atg.wa.gov
Jeffrey T. Even, WSBA No. 20367
Deputy Solicitor General
jeffe@atg.wa.gov
Rebecca R. Glasgow, WSBA No. 32886
Deputy Solicitor General
RebeccaG@atg.wa.gov
Office of the Attorney General
1125 Washington St. SE
P.O. Box 40100
Olympia, WA 98504-0100
Attorneys for Defendants
By Email & U.S. Mail

Paul J. Lawrence
Gregory J. Wong
Sarah S. Washburn
Pacifica Law Group LLP
1191 Second Avenue, Ste 2000
Seattle, WA 98101-3404
Paul.lawrence@pacificalawgroup.com
Greg.wong@pacificalawgroup.com
Sarah.washburn@pacificalawgroup.com
By Email & U.S. Mail

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED: March 9, 2015, at Seattle, Washington.

/s/ Gina Chan
Gina Chan

DECLARATION OF STEVEN W. FOGG IN SUPPORT OF
PLAINTIFFS' RESPONSE TO MOTION TO INTERVENE - 3
Case No. 3:14-cv-6026 BHS

**CORR CRONIN MICHELSON
BAUMGARDNER FOGG & MOORE LLP**
1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900